

Fill in this information to identify the case:

Debtor 1 EDWARD A. HAGGANS

Debtor 2  
(Spouse, if filing)

United States Bankruptcy Court for the: Middle District of Pennsylvania

Case number 1:18-bk-04971-HWV

Form 4100R

**Response to Notice of Final Cure Payment**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

**Part 1: Mortgage Information**

Name of Creditor: Freedom Mortgage Corporation

Court claim no. (if known):

6

Last 4 digits of any number you use to identify the debtor's account: 1422

Property address: 2131 Green Street

Number Street

Harrisburg, PA 17110

City State ZIP Code

**Part 2: Prepetition Default Payments**

Check one:

Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

**Part 3: Postpetition Mortgage Payment**

Check one:

Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 02/01/2024  
MM/DD/YYYY

Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due:

(a) \$ \_\_\_\_\_

b. Total fees, charges, expenses, escrow, and costs outstanding:

+(b) \$ \_\_\_\_\_

c. **Total.** Add lines a and b.

(c) \$ \_\_\_\_\_

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

MM/DD/YYYY

Debtor1 EDWARD A. HAGGANS  
First Middle Last

Case number (if known) 1:18-bk-04971-HWV

## **Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- all payments received;
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amounts the creditor contends remain unpaid.

**Part 5: Sign Here**

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

*Check the appropriate box::*

I am the creditor.  
 I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

/s/Mario Hanyon Date 01/25/2024  
Signature

Print Mario Hanyon \_\_\_\_\_ Title Attorney \_\_\_\_\_

Company Brock & Scott, PLLC

If different from the notice address listed on the proof of claim to which this response applies:

Address 3825 Forrestgate Dr.  
Number Street

Winston-Salem, NC 27103

Contact phone 844-856-6646 Email PABKR@brockandscott.com

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**  
*Harrisburg Division*

IN RE:  
EDWARD A. HAGGANS

Freedom Mortgage Corporation,  
Movant

vs.

EDWARD A. HAGGANS ,  
Debtor

Case No. 1:18-bk-04971-HWV  
Chapter 13

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a true and exact copy of the foregoing Response to Notice of Final Cure Payment has been electronically served or mailed, postage prepaid on this day to the following:

Via Electronic Notice:

Robert E. Chernicoff, Debtor's Attorney  
Cunningham and Chernicoff PC  
2320 North Second Street  
Harrisburg, PA 17110  
rec@cclawpc.com

Jack N Zaharopoulos, Bankruptcy Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

US Courthouse, US Trustee  
1501 N. 6th St  
Harrisburg, PA 17102

Via First Class Mail:

Edward A. Haggans  
2131 Green Street  
Harrisburg, PA 17110

Date: January 25, 2024

*/s/Mario Hanyon*

Andrew Spivack, PA Bar No. 84439  
Matthew Fissel, PA Bar No. 314567  
Mario Hanyon, PA Bar No. 203993  
Ryan Starks, PA Bar No. 330002  
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